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October 2, 2017

VIA E-MAIL

E. Vanessa Assae-Bille
Enforcement Attorney
Consumer Financial Protection Bureau
1700 G Street, NW
Washington, DC 20552
Elizabeth.Assae-Bille@cfpb.gov

Re: *Civil Investigative Demand to Law Offices of Crystal Moroney, P.C. Dated June 23, 2017*
Our File Number: 17-2070

Dear Ms. Assae-Bille:

I enclose the following documents in connection with continued responses to the above-referenced Civil Investigative Demand:

1) Amended Supplemental Response of Law Offices of Crystal Moroney, P.C. to Civil Investigative Demand for Production of Documents, Tangible Things, Written Reports, and Answers to Interrogatories. This Supplemental Response amends the response dated September 15, 2017 which inadvertently listed Interrogatory Number 13 rather than Interrogatory Number 12 on page 1 of that response.

2) Schedule of Items withheld from response to Civil Investigative Demand by Law Offices of Crystal Moroney, P.C. This schedule is being delivered pursuant to the provisions of 12 C.F.R. § 1080.8(a) and pursuant to your letter of July 25, 2017 modifying the Civil Investigative Demand and providing that a "privilege log" be produced by October 2, 2017.

I ask that you acknowledge receipt of this e-mail with the accompanying documents.

Thank you for your kind cooperation.

Very truly yours,

THE LAW OFFICES OF RONALD S. CANTER, LLC

By: /s/ Ronald S. Canter
Ronald S. Canter

RSC/mdl

Enclosure(s)

V:\RSC-MDL\2017\OCT\2\2017 10 02 LETTER TO E. VANESSA ASSAE-BILLIE (2).DOC

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**AMENDED SUPPLEMENTAL RESPONSE OF LAW OFFICES OF CRYSTAL
MORONEY, P.C. TO MODIFIED CIVIL INVESTIGATIVE DEMAND FOR
PRODUCTION OF DOCUMENTS, TANGIBLE THINGS, WRITTEN REPORTS, AND
ANSWERS TO INTERROGATORIES**

INTERROGATORY

12. Identify each creditor or third-party for which the Company has performed Debt Collection Activities. For each creditor or third-party, and for each year during the Applicable Period, specify:

- a. the Company's contact Person;
- b. the period of the Company's services;
- c. the services the Company provided;
- d. the total number of Debt(s) the Company attempted to collect in any way;
- e. the dollar amount of Debt the Company attempted to collect in any way; and
- f. the Company's total revenue from Debt Collection Activities.

RESPONSE: Ms. Moroney and the Law Office of Crystal Moroney, P.C. have retained expert ethics counsel to advise them on the permissibility of providing the information requested in Interrogatory 12. Upon the advice of counsel and her own independent conclusions about the applicability of the professional rules of ethics to the CFPB's current CID, Ms. Moroney and the Law Office of Crystal Moroney, P.C. respectfully decline to provide the information requested in Interrogatory 13 for the following reasons.

Ms. Moroney is licensed to practice law in New York and New Jersey and practices law in each state. Both States have adopted professional rules of ethics. Included in those ethical rules is Rule 1.6, which is similar, albeit not identical, in each State. The Rules focus on "confidential information" and the obligation of attorneys to protect "confidential information." NJRPC 1.6 protects "information relating to the representation of a client." This information includes any and all information relating to the representation, regardless of its source, whether it is subject to an evidentiary privilege and regardless of whether the client has asked that the information remain confidential. *In re Advisory Opinion No. 544 of New Jersey Supreme Ct. Advisory Comm. On Professional Ethics*, 103 NJ 399, 511 A2d 609, 612-613 (1986); *see also, Advisory Opinion No. 695 of New Jersey Supreme Ct. Advisory Comm. on Professional Ethics*, 175 N.J.L.J. 1393 (April 5, 2004)

(“R.P.C. 1.6(a) sets forth a broad duty of confidentiality, more extensive than the testimonial attorney-client privilege, extending to any ‘information relating to representation of a client,’ and then sets out a series of exceptions, none applicable to the current inquiry.”). Under this broad reading, a lawyer may not disclose information concerning the client or the client’s matter. *Estate of Kennedy v. Rosenblatt*, 447 NJ Super 444, 453, 149 A3d 5, 10 (App. Div. 2016). NJRPC 1.6 also prohibits the disclosure of information which “serves to identify the client.” *In re Advisory Opinion No. 544 of New Jersey Supreme Ct. Advisory Comm. On Professional Ethics*, 103 NJ at 402, 511 A2d at 610. The identity of the client itself is protected confidential information which attorneys must not disclose.

Similarly, NYRPC 1.6(a) prohibits disclosures by a lawyer that would not itself be confidential information but “could reasonably lead to the discovery” of confidential information. NYRPC 1.6(a), Comment [4]. Like NJRPC 1.6(a), NYRPC 1.6(a) is broader than the evidentiary rule of attorney client privilege and extends to all factual information “gained during or relating to the representation of a client.” NYRPC 1.6(a), Comment [4A]. It includes information which has “any possible relevance to the representation or is received because of the representation.” *Id.*

Ms. Moroney is obligated to protect her clients’ confidential information. This Interrogatory requests not only the identity of the Firm’s clients, but also information which has “any possible relevance” to the representation and is “received because of” the representation, including but not limited to the identity of the client, the nature of the services provided, the nature and details of the account(s) for which the Firm provided services, and the fees paid by clients for the legal services provided. By any measure, these requests require the firm to reveal what the rules contemplate as “confidential information.” Ms. Moroney is duty-bound to protect this information and refrain from disclosing it.

**SCHEDULE OF ITEMS WITHHELD FROM RESPONSE TO CIVIL INVESTIGATIVE
DEMAND BY LAW OFFICES OF CRYSTAL MORONEY, P.C.**

The Law Offices of Crystal Moroney, P.C. ("LOCM"), hereby submits its statement of withheld material in accordance with the provisions of 12 C.F.R. § 1080.8(a) and states as follows:

PREFATORY STATEMENT

During a conversation with CFPB enforcement attorneys on September 28, 2017, a question was raised as to whether the statement of items withheld from the response includes information requested in Request for Written Report No. 1.

On July 21, 2017, LOCM submitted its response to the CID. On pages 12-13, LOCM provided a substantive response to Request for Written Report No. 1. LOCM stands on its initial response and has not included within this statement of items withheld any information that is responsive to Request for Written Report No. 1.

REQUEST FOR INTERROGATORIES:

Interrogatory Number 12: The information sought is being withheld based on advice that LOCM has received from experienced ethics counsel that the identity of its clients is protected by Rule 1.6, Rules of Professional Conduct. Please also refer to Response to Requests for Documents Number 12.

REQUESTS FOR DOCUMENTS:

Request for Document 2: Doc. Request No. 2, pages 9, 10, 21, 22 and 24 have been produced in redacted form to shield the identity of LOCM's clients. LOCM made these redactions pursuant to advice received from experienced ethics counsel that the identity of its clients is information protected from disclosure pursuant to Rule 1.6, Rules of Professional Conduct. The author of all documents is Crystal Moroney, Esquire.

Request for Document 6: Doc. Request 6, pages 254, 256 and 268 have been produced in redacted form in order to protect the identity of LOCM's clients from disclosure. LOCM incorporates by reference its explanation as to Document Request No. 2. All documents were authored by Crystal Moroney, Esquire.

Document Request No. 12: LOCM has identified 56 agreements responsive to this request. Of the 56 agreements, 14 were drafted by LOCM's clients, the remaining 42 were drafted by Crystal Moroney, Esquire. LOCM has withheld production because it has been advised by experienced ethics counsel that these documents would identify its client and disclosure would violate Rule 1.6, Rules of Professional Conduct.

Document Request No. 14: LOCM has withheld from production two documents identified as a four (4) page "Vendor Management Review" dated June 8, 2015 prepared by LOCM's client and an 8 page "Vendor Risk Assessment Report" dated May 8, 2015 prepared by LOCM's client. LOCM cannot identify the author of these documents because the information is protected from disclosure by Rule 1.6, Rules of Professional Conduct.

REQUESTS FOR TANGIBLE THINGS:

Request for Tangible Things No. 1: LOCM has withheld from its production information subject to this request based on the opinion of experienced ethics counsel that disclosure would violate Rule 1.6, Rules of Professional Conduct. These items consist of electronically stored data containing LOCM's file records of the accounts referenced in LOCM's response to Request for Reports 1(b).

Request for Tangible Things No. 2: LOCM has withheld from its production information subject to this request based on the opinion of experienced ethics counsel that disclosure would violate Rule 1.6, Rules of Professional Conduct. These requested items consistent of 569,862

electronically stored recordings for the 18 month period prior to LOCM's receipt of the CID, the time period for retaining these recordings that LOCM had implemented before receipt of the CID. LOCM will update this statement once it obtains data as to the number of call recordings it has kept since receipt of the CID.

Request for Tangible Things No. 3: *See*, Response to as Request for Tangible Things No. 2.

Request for Tangible Things No. 4: *See*, Response to as Request for Tangible Things No. 2.

REQUESTS FOR WRITTEN REPORTS:

Request for Written Report No. 3: LOCM has produced redacted Report Request No. 3, pages 459-462. This document consists of 727 entries regarding disputes to credit reporting agencies from February 9, 2017 through June 29, 2017. LOCM cannot produce the information relating to these disputes because production would disclose information relating to LOCM's representation of its clients. LOCM is under a duty to protect that information pursuant to Rule 1.6, Rules of Professional Conduct. The report comprising document numbers 459-462 was reviewed by Crystal Moroney, Esquire from data obtained from Equifax.

Request for Written Reports No. 4: LOCM has produced Report Request No. 4, pages 463-473 with redactions to protect from disclosure the identity of LOCM's clients and/or the identity of consumers which would provide information leading to the identity of LOCM's clients. These redactions are required by Rule 1.6, Rules of Professional Conduct. Crystal Moroney was the author of this report.

Request for Written Reports No. 5: LOCM has compiled, but has not produced, the following documents that would be responsive to this request. LOCM is withholding production of these documents labeled "Report Request No. 5" because the information contained in each paper

would disclose information relating to the representation of LOCM's clients in violation of Rule 1.6, Rules of Professional Conduct:

- Pages 630-632 – April 11, 2014 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 633-634 – August 17, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 635-637 – March 1, 2014 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 638 – May 21 2017 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 639 – August 2, 2017 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 640-643 – March 20, 2014 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 644 – February 16, 2010 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 645-647 – September 5, 2012 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 648 – October 15, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 649 – July 23, 2016 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.

- Pages 651-652 – September 29, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 653-654 – October 1, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 655-656 – April 15, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 657 – January 31, 2017 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 658 – July 18, 2017 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 659-660 – March 25, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 661-662 – October 25, 2014 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 663-664 – April 15, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 666-667 – May 27, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 668-669 – June 3, 2017 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 670-671 – May 28, 2017 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.

- Pages 672-673 – January 4, 2016 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 674 – March 26, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 675 – letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 676-677 – January 3, 2016 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 678 – January 20, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 679 – letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 680-681 – January 30, 2012 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 682-684 – December 11, 2014 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 685-686 – December 12, 2016 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 687-690 – June 29, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 691-692 – October 20, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.

- Pages 694-695 – April 15, 2015 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 696-697 – letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 698-699 – April 27, 2016 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 700-702 – May 5, 2015 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Page 703 – April 28, 2015 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Page 704 – April 13, 2015 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Page 705 – March 26, 2015 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 706-707 – March 11, 2015 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Page 708 – March 1, 2015 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Page 709 – June 5, 2017 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 710-711 – October 28, 2016 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.

- Page 712 – April 26, 2016 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 713-716 – letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 717-721 – October 23, 2015 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Page 722 – September 10, 2015 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Page 723 – March 6, 2016 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 724-726 – March 24, 2016 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Page 727 – March 18, 2016 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Page 728 – letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Page 729 – November 4, 2016 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Page 730 – letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Page 731 – September 21, 2015 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.

- Page 732 – August 5, 2017 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Page 733 – April 28, 2017 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Page 734 ??
- Page 735 – February 22, 2016 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Page 736 – January 28, 2016 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 737-738 – July 15, 2016 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 739-742 – November 21, 2016 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 743-744 – August 6, 2016 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Page 745 – June 23, 2017 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 746-748 – June 30, 2015 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 749-750 – July 7, 2015 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 751-752 – February 3, 2017 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.

- Page 753 – May 31, 2017 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Page 754 – July 21, 2017 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 755-756 – March 9, 2017 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 757-758 – September 14, 2016 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 759-760 – August 15, 2016 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 761-762 – June 14, 2017 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Page 763 – May 9, 2017 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Page 764 – July 19, 2017 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Page 765 – August 4, 2017 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 766-767 – July 4, 2017 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 768-769 – August 6, 2016 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.

- Pages 770-772 – January 8, 2016 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Page 773 – July 21, 2016 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 774-777 – June 29, 2016 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 778-781 – June 20, 2016 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 782-784 – June 13, 2016 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 785-787 – June 1, 2015 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Page 788- – May 29, 2015 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 789-794 – May 25, 2016 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 795-798 – April 13, 2016 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Page 799 – March 19, 2015 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 800-808 – January 26, 2016 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.

- Pages 809-812 – September 24, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 813-816 – September 24, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 817-824 – September 9, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 825-831 – August 27, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 832-836 – July 24, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 837-840 – July 1, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 841-845 – July 1, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 846-849 – June 25, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 850 – June 23, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 851-856 – June 5, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 857-862 – June 5, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.

- Pages 863-881 – April 14, 2015 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 882-891 – March 19, 2015 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 892-899 – March 16, 2015 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 900-915 – March 11, 2015 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 916-934 – March 10, 2015 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 935-946 – March 2, 2015 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 947-953 – February 23, 2015 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 954-957 – February 18, 2015 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 958-961 – February 9, 2015 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 962-965 – December 19, 2014 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.
- Pages 966-968 – December 19, 2015 letter of dispute either identifying LOCM’s client and/or matters relating to LOCM’s representation of the client.

- Pages 969-973 – November 24, 2014 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 974-978 – September 17, 2014 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 979-988 – July 30, 2014 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 989-990 – July 14, 2014 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 991-1001 – July 14, 2014 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 1002-1007 – June 10, 2014 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 1008-1009 – May 20, 2017 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 1010 – May 7, 2014 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 1011-1017 – May 5, 2014 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 1018-1019 – May 1, 2014 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 1020 – July 25, 2014 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.

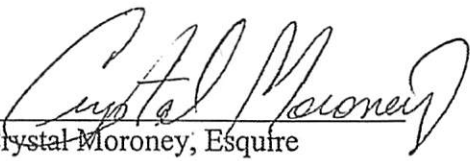
- Pages 1021-1025 – October 7, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 1026-1029 – March 6, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 1030 – October 10, 2016 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 1031 – March 19, 2014 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 1032 – April 14, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 1033-1035 – December 23, 2014 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 1036 – November 17, 2016 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 1039 – September 9, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 1040-1042 – May 6, 2016 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 1043-1045 – June 6, 2016 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 1046 – January 29, 2016 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.

- Pages 1047-1050 – December 3, 2015 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 1051 – July 25, 2017 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 1052 – April 6, 2016 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 1053 – June 14, 2016 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 1054 – September 7, 2016 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 1055-1057 – March 22, 2016 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 1058 – January 19, 2017 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 1059-1060 – January 7, 2017 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Pages 1061-1062 – May 10, 2017 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 1063 – July 12, 2017 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 1064 – July 18, 2017 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.

- Page 1065 – July 31, 2017 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.
- Page 1066-1069 – July 5, 2017 letter of dispute either identifying LOCM's client and/or matters relating to LOCM's representation of the client.

Request for Written Reports Number 5: LOCM has produced redacted documents in Report Request No. 3, pages 490-91, 505, 506, 529, 540, 558-560, 565-573, 600, 604, 605, 611, 612, 620, 622 and 623. These redactions had been made to protect the identity of LOCM's clients in accordance with LOCM's obligation under Rule 1.6, Rules of Professional Conduct. The author of each document is evident by the unredacted parts of each paper produced.

Dated: 9-29-2017

By: 
Crystal Moroney, Esquire